



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA	:	CRIM. NO. 13-CR- <u>316 (GTS)</u>
v.	:	<u>INDICTMENT</u>
	:	Violation: 21 U.S.C. §§ 846
	:	1 Count
ALLAN PETERS, aka "Hiio,"	:	County of Offense: Franklin
	:	
	:	
Defendants.	:	
	:	

THE GRAND JURY CHARGES:

Count 1

**(Conspiracy to possess with the intent to distribute
and to distribute a controlled substance)**

Between in or about 2005 and on or about February 25, 2011, in Franklin County in the Northern District of New York and elsewhere, the defendant,

ALLAN PETERS, aka "Hiio,"

and others, known and unknown, conspired to knowingly and intentionally possess with intent to distribute and to distribute a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846. That violation involved 1,000 kilograms or more of a mixture or

substance containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(A).

Forfeiture Allegation

1. 21 U.S.C. § 853 - Drug trafficking forfeiture:

The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 841, the defendants,

ALLAN PETERS shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

A. **Money Judgment:** A money judgment in the amount of \$1,000,000.00, representing the gross proceeds of the offenses described in Counts 1 of the Indictment.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

Dated: 8/14, 2013

A TRUE BILL,

FOREPERSON OF THE GRAND JURY

RICHARD S. HARTUNIAN
UNITED STATES ATTORNEY

BY: 

Katherine E. Kopita
ASSISTANT U.S. ATTORNEY
Bar Roll No.: 517944